

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
DEQUAN REYES,	:	
	:	
Plaintiff,	:	
	:	23 Civ. 1145 (LGS)
-against-	:	
	:	<u>ORDER</u>
CITY OF NEW YORK, et al.,	:	
Defendants.	:	
-----X	:	

LORNA G. SCHOFIELD, District Judge:

WHEREAS, an order issued June 29, 2023, invited Plaintiff to file a letter seeking permission to file a Second Amended Complaint.

WHEREAS, Plaintiff filed via U.S. mail pages of a proposed Second Amended Complaint. Those pages are appended to this order.

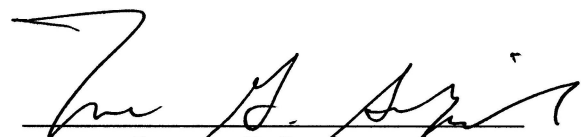
WHEREAS, under Federal Rule of Civil Procedure 15, when a party seeks to amend its pleading more than once, leave to do so should “freely [be] give[n] . . . when justice so requires.” It is hereby

ORDERED that Plaintiff’s filing is construed as a motion for leave to amend. Plaintiff’s motion is **GRANTED**. In the interest of clarity, the Second Amended Complaint consists of the First Amended Complaint, Dkt. No. 7, and the additional pages, which are appended to this order.

ORDERED that the deadline for all Defendants to answer, move or otherwise respond to the Second Amended Complaint is **September 8, 2023**.

The Clerk of Court is respectfully directed to mail a copy of this order to Plaintiff.

Dated: July 24, 2023
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

80

SECOND Amended Complaint

STATEMENT OF FACTS

GRVC

ON OR ABOUT THE DATE OF 4-15-2021 plaintiff states that deffendent tyneka greena , and floor officer morris told plaintiff that he would not be getting his halal food or rahmadan food, because he was a fake muslim !! and plaintiff also claims that on the on or about date of 4-20-23 he ask defendent tyneka green, for a grievance sheet and defendent was told that he did not need it because everything that he need was to go threw deffendents, adw henry , officer morris, and tyneaka green , plaintiff then asked to (call) his lawyer and deffendent tyneaka green said to ask defendent morris who was the floor officer , and when plaintiff asked he was told no, then about 30min latter deffendent morris came and popped/broke plaintiffs phone jack ,so that by any chance of any other officer letting inmate call his attarnys that it would be imposable ..(g.r.v.c) I.T RECORDS, AND 15a housing area gentic videos will support this arguement plaintiff complanes of never being allowed to grieve these issues and and being denied halal food on rahmadan perposly ! then it affected plaintiff so much he felt that maybe he should not be muslim anymore , And plaintiff also wanted to seek mental health, and Defendents herein was neglegent plaintiff Issues AND needs AND No papper work was generated to help plaintiff further. when plaintiff asked For Help from tyneaka green. AND ADW Henry

- plaintiff state that on the on or about date of june-20-2021 in (ISA) diffendent morris was very frustrated at plaintiff for not strip searching correctley in unlawful 3-point area seach area , that plaintiff said ok forget medical then well im going to my cell im okay , when deffendent morris pulled plaintiff wile HANDCUFFED WITH HIS HANDS BEHIND HIS BACK, YANKING PLANTIFF, WITH JOHN DOE OFFICERS HELP, THEN SLAMMING PLANTIFF TO THE FLOOR AND THEN YELLING YEAH YOU BITCH ASS NIGGER I GOT THE UPPER HAND IN THIS HOUSE !!!!! this my house plaintiff then noticed that his tooth was now chipped from being slammed face first to the floor, and also that his lip was busted plantiffs chin was also bleeding a little! plaintiff was now asking to see medical A.S.A.P WHEN DEFFENDENT MORRIS TOLD THE FLOOR CAPTAIN NO! hes not getting medical captâans name was (palmer campbell) GRVC CAPTAIN plantiöf was a little unconcuise getting up so he dose not remember much ELSE OF INCEDENT. ■■

- PLANTIFF WAS TAKEN TO DENTALE MONTHES LATTER AFTER (THIS) INCE+ dent took place proof can be shown in plantiffs dental reports for 2021 or 22...

plaintiff notified sick call latter that week for tylenol for his head aches, AND MOUTHWASH TO NUMB THE ACHES OF HIS BUSTED LIP AND BLEEDING GUMBS !

plaintiff would like THE VIDEO OF THIS INCEDENT, TO ALSO support his ARGUMENT, IN THE PROSECUTION OF THIS Complant, HE Demands Gentec Footage AND Body Cam Footage!

Plantiff also states Herein that officer morris, and Deputy Henry that plaintiff asked for medical on this Day Was Neglegent on this Day to plantiffs medical Needs and there was little to No papper work Generated From This Issue.

BETWEEN THE TIME PERIODS OF MARCH 11 2021 through

ON OR ABOUT MAY 2ND OF 2022 WHILE HOUSED IN UNIT 15A PLAINTIFF WAS TORTURED

BY DIFFENDENT CO MORRIS FOR ABOUT A YEAR STRAIGHT THE PLAINTIFF WAS SUBJECT

to FORCABLE SEARCHES -FORCED TO GET NAKED IN SOMETHING CALLED A 3-point search area, WHICH EVEN OFFICERS AND INMATES VIEW AS WRONGFUL, BECAUSE IT HAS A CAMRA INSIDE IT VIOLATING YOUR PRIVACY, PLAINTIFF WAS SEARCH MANY TIMES OVER (200) in this said area by correction officer morris, shield # 10720, and captain blake which are both diffendents in this CASE, AND EACH TIME PLAINTIFF WOULD PROTEST AND WAS TOLD THAT HE WAS BEING SUBJECTED TO THIS UNLAWFUL STYLE/ type search by the orders of, DIFFENDENTS TIFFANY MORALES, WARDEN RENEE, ADW HARVEY, ADW HENRY, OFFICER WILLAM MC NEIL, CAPT ANDREI BLAKE, CAPT ERICA LAW, WHEN HE WOULD BE COMING FROM AND OR GOING TO, YARD/recreation, clinic, visits, court, and ex...

on or about APRIL 20th and 21, 22, 24 of 2021 ~~on or about~~ ~~diffendents~~ co morris denied me medication and my visits so both diffendents ~~co morris~~ denied me medication, and (my) hearings rights, and visits for various days on in diffendent cox said fuck him he dont need no medication and on april 25 or 26 2021 cox said i was dead on my medication, diffendent morris

contacted visit staff and to diffendent capt le flure that plantiff was a snitch, morris diffendent herein came to plantiffs cell and asked plantiff wat was all these 311,s and grievences about involving himm and why was i telling, inmates not to disrespect diffendent and instead call 311 on himm when theres a issue, beleiving plantiff dequan reyes was the root issue of why diffendent was getting contsant verbal reprimandations by adw green, and capt maxwell, and adw henry, as retaliation diffendent morris approched plantiffs cell, escorted plantiff to shower then splashed him in the face with piss the left inmate in shower for 3 hours on or about april 2nd 2022 in 15a house, and as you will see in listed case pro se same 3 point issues

and violations from same diffendents JOHMANNI ANDUZE V CITY NEWYO 2002,

plantiff visits (contact) (privlages) being takign ~~be~~ effected him harshly his sons mother stop bring hoim because off the essessive searches and none contact, his mom has caught cancer, and he (hasnt) been able to see her in years, his grand-father has passed, friends has passed away and he wish he was able to hug them first! From THE DATES OF OCT 9TH 2020 TILL FEB-1-23

AND ON 5-1-2022 CO MORRIS APPROACHED PLAINTIFFS CELL DOOR QUIT SWIFTLEY AND SLAMMED PLAINTIFF ARM IN FOOD SLOT INJURING PLAINTIFFS ARM, THEN TELLING HIM TO NOW CALL 311 , FOR MEDICAL ATTENTION , OR SUE ~~ME~~ ME PUSSY, WHILE WALKING AWAY FROM PLAINTIFFS CELL LAUGHING, ALL WHILE PLAINTIFF WAS HOUSED IN UNIT 15A AT GRVC FACILITY... on or about 4-8-22..

DIFFENDENT MORRIS CHANGED PLAINTIFFS PIN NUMBER AND GAEIT TO ANOTHER INMATE , STOPING PLAINTIFF FROM BEING ABLE TO CONTACT HIS FAMILY MEMBERS , THE NUMERS THAT WAS CALLED (AT THIS TIME) WAS 646-920-4516, and ~~404-566-1025~~ as YOU WILL SEE THREW YOUR INVESTIGATION ALSO SEE EXHIBIT 34 for more proof of inciedent all because of plaintiffs 311 calls on diffendent and not eating hñis food which should not be forced apon..

and on the same date of on or about 4-8-22 ,diffendent popped planfiffs wall jack and never called I.T perposly so that plaintiff couldnt call his family and or 311 to motify them stating everyday nigga you gone= suffer bitch " after he (walked away) , leaving plaintiff depressed and not able to use the phone for 3 weeks..

PLAINTIFF HEREIN STATES THAT HE NOW SUFFERS FROM ASTHUMA, BECAUSE OF DEFFENDENTS ACTIONS, NEGLECT ,AND FAILURE TO PROTECT AND SERVE PLAINTIFF WAS HOUSED IN UNIT 13a and everyday diffendent would say nigga my weight is up , nobody would get medical in this bitch !on orb about ~~March~~ March 15th of 2022 plaintiff was complaning of shortness of breath, to dieffendent morris (ESH FLOOR OFFICER) march-2nd-22, 3rd 2021 , may 10, 2021, may 1st 2021, and on all said dates on or about plaintiff was told by deffendent morris, fuck you nigga you dont need no medical attention , plaintiff was having these issues because of all the constant fires be set and hot getting medical attention on such days , plaintiff remembers days were there was no way to breath because of the black smoke that clouded the housing area and hallways , officer morris would TEN inmates To SET A Fire Puposley ~~call inmates on pepose~~ so that he could spray them with fire extinguisher, and mase

(12)

PLANTIFF STATES HEREIN ON THESE LISTED DATES ,DIFFENDENTS,
CAPTAIN RAMOS # , AND CAPT LAW #_____,CAPTAIN OF GRVC
UNITS 11A, 11B, 13A, 13B, 15A,15B (SEG) RECREATIONS,DIFFENDENTS PUT
PLANTIFF ON UNLAWFULL RECREATION RESTRICTIONS BASED OF THE
DISSLIKES AND OWN ,WRONGFUL CONDUCTS,AND WAS TOLD NUMERIOUS
OF TIME INSIDE THESE BOX ,AND PUNITIVE LOCKDOWN SETTING HOUSEHOLDS
THAT IF HE REPORTED IT THAT , THN HE WOULD DEFFENETLY NEVER
RECIVE RECREATION LATTER ,DIFFENDENTS MC NEIL,AND CQ(WOLONSKI)
TOLD PLANTIFF THAT THEY WOULD MAKE SURE PLANTIFF NEVER USE THE
PHONE IN THERE PRESENTS SO THAT PLANTIFF COULD NEVER REPORT
THE FOLLOWING...

ONOR ABOUT OCT 10TH,11,12,13,14,15,16,17,18,19,20,21,22,23,24,
25,26, 27,28,29,30,31 -OF 2020 Year IN UNIT 13B
NOVEMBER 1ST,2,3,4,5,6,7,8,9,AND 10TH PLANTIFF WAS HOUSED IN UNIT
13B AND INFORMED GRIVENCE,AND ADW HENRY THAT HE WASNT GETTING HIS
VISTTS ,OR REC AND SHE STATED THATS GOOD 4 YOU

ON OR ABOUT MAY 10TH ,11,12,13, THREW JUNE 10TH 2021 PLANTIFF WAS
STILL ON DIFFENDENTS HOT SHEET FOR NO RECREATION... PLANTIFF THEN
INFORMED (DEPT PHILLIPPS ADW) AND SHE SAID THAT SHE WHOULD TRY TO GET
ME TO REC ONE DAY.IN UNIT 11A BOX...

ONOR ABOUT DECEMBER 1ST,2,3,4,5,6,7,8,9,10 THREW 31ST 2022 IN UNIT(13A)
PLANTIFF STATES THE SAME ,ON OR ABOUT DECEMBER 13TH PLANTIFF SEEN ADW
HENRY AGAIN AND HE WAS CRYING , AND SHE STOPED AT HIS CELL AND SAID
BABY DADDY ITS OK RECREATION IS REALLY WHEN YOU GET HOME AND UP IN
THIS PUSSY, RIGHT !?

ON OR ABOUT FEBUARY 1,2,3,4,5,6,7,8,9,10,11,THREW 28TH PLANTIFF (2022)
WAS HOUSED IN 13B AND WAS TOLD MANY OF TIMES BY BLAFDIFFENDENT CAPT
RAMOS THAT HE WASNT REALLY SPANISH , HE WAS A NIGGER AND HE CALLS 311
TO MUCH THATS WHAT NIGGERS DO..

AND THREW OUT ALL OF THIS TIME IN 23 HOURS AND MANDATED 1 HOUR RECREATONAL
PUINITIVE ,BOX HOUSING ,DIFFENDENTS LAW, AND HENRY, AND MC NIEL ,AND RAMOS,
ALL AGREED NOT TO GIVE ME SHOWERS SOME DAYS, AND OR VISITS , IF NEEDED
PLANTIFFS ALSO TOLD THERE (JHON DOE)OFFICERS THAT DID THE DAY TO DAY
REC NOT TO STOP BY MY CELL WHEN THERE WALKING WITH THERE BODY CAMRAS ON
FOR RECREATION ...From 2020 threw 2022 !

ON THIS SAID DATE ON OR ABOUT 5-10-21 Plaintiff was placed in this cell 7 in 11A (unit) by defendants, Warden Rene, Mc Neil for over (28) days

on 11-9-2022 plaintiff was put in cell (B) ~~11A~~ for about 7 Days
(2A) Housing Unit. Order BY (ADW) Henry...

on or about 11-16-22 plaintiff was placed in a cell to rot in 2A - Unit Housing.

By Defendant William Mc Neil of Security IN (GRVC) Were Defendant said Nigga and your Waters Not coming ON! This what happens to people who sue me and mines that gotta Live in Down Cells like the case with Alexander Williams with this Same Defendant "22-CV- Williams V. City of NY", Where plaintiff was Subjected and placed in Same Cell. All times mentioned herein plaintiff asked for a "Cell Inspection Sheet" to show all electrical Devices, were secured, toilets and sink were working properly, ~~an~~ window was secured and operatable, and ex But was Denied!, IN case (Sanchez V. Warden, 2018) 17-CV-840-JD-MGG Were the plaintiff argued very similar Issues in his case.

• ON THE DATES LISTED HEREIN , PLANTIFF WAS PLACED IN CELL AREA IN RIKERS ILAND HOUSING UNITS WERE PLANTIFF NOTIFIED THE JOHN/jane DOE OFFICERS THAT WAS PLACING PLANTIFF IN THESE CELLS THAT THEY WERE DOWN CELLS ,BUT OFFICERS AND SOME DEFFENDENTS DID NOT CARE AND THESE DEFFENDEENT SAID THAT THATS WHAT PLANTIFF DESERVED..... ON or about MAY 2nd plantiff was sent to 5b housing unit were deffendent morris ,said that deffendent tyneaka green (adw) wanted plantiff to go so that he would die quick and fast !! wile deffendent morris was smiling ! once plantiff was esscorted to the housing unit 5B INMATES WERE SEEN PUSHING PASS JOHN/ JANE DOE OFFICER TRYING TO ASSULT PLANTIFF ,WERE PLANTIFF WAS THEN SPRAYED THEN MOVED TO SEG INTAKE GETTING NO MEDICAL TREATMENT, PLANTIFF WAS TOLD TO GO INTO A COLD CELL WERE THE TOLET DIDNT WORK , AND THE SINK WAS BROKEN ! plantiff was put inthis cell for about 3 days ~~and~~ by deffendent captain blake , were plantiff asked for medical attention, bath, because his skin was burning and he could not breath ! when captain blake said no i dont you pussy hole (in his jamaican) accsent plantiff could not sleep the floor had mice ,and urine all over it plantiff was forced to bathroom on the cell floor were he unfortunatley had to sleep with no matress for days !! all in G.R.V.C (2022)

ON OCT-9-2020 plantiff was placed in a down cell for over 30 days in 13B (unit) BOX GRVC.

ON Jan-2-2021 plantiff was placed for living in a down cell for over 30 days! in Unit (13B) GRVC.

ON March-3-2022 plantiff was placed for living in a down cell for 4 monthes, in 15A unit sink did not work ! Deffendent Morris said he Broke it!

ON OCT-19-2022 plantiff was placed in Cell For about 10 DAYS in Unit 4B OF GRVC. tolet was Down and Slot did not open many officers and Inmates tryed!

On or about the date of March-1-23 Defendant Bros # 10295 went to the grve (KK) area to Grab food From area to give to plaintiff, Defendant Bros left plaintiff his food was now here nice and Ready Empliyng that he (DEFFENDENT) Bros had did something to plaintiff's food! Once plaintiff got it @ about 9:10 pm In housing area 1A plaintiff seen that there was [spit] on his food From Deffendent Bros, Deffendent Bro had Left the the Floor By this time ... plaintiff told (ADW) Henry ON 3-7-23 that he Did not want to see officer Bros In housing area again or serving him food, DEFFENDENT (ADW) Henry said I Dont care, nigger call 311 Bitch! call plaintiff called 311 as he was told, and filed a Greivance - 311-005-91407

311 - EC-005-91406

311 - EC-005-91411

311 - EC-005-91410

311 - EC-005-91291 Also See Exhibit 35

GO, Are not suppose to serve Inmates food unless It is Hurveticly Siled!

And ON OR ABOUT 3-10-23 IN Housing area 1A Deffendents Bros, Mc NEIL told plaintiff to Write (nothing) on the Statement sheet that was provided to inmate by John Doe Captain on this Day or Els plaintiff would get Hurt, So plaintiff never wrote anything Els ABOUT Incident.

.....
.....
.....
plantiff states also that officer(defendent) herein faled
to protect and serve plaintiff.....

PLANTIFF ALSO STATES THAT FROM THE CRULE ACTIONS OF DEFFENDENT
BROS IN , GRVC HOUSING UNIT 1a on the date of 2023,
that plaintiff has been then scared to eat ant amy doc foods
ecsecily made by officers , plaintiff also complanes of
constant stomic ahees every other night plaintiff is having
a very hard time sleeping and feels suicidal , and wants
to seek mentail health/therapy everyday , and that maybe they
can stop the pain that he feels
plantiff has asked the amenatration dep of grvc deps, and captains
to tell his family that he loved them if he was to die on
rikers iland by the hands of himself or other correction
officers (defendents)..... plaintiff feels that he is losing
alot of wieght also,

DEFFENDENT BROS WAS REPRIMANDED FOR spitting in plaintiffs meal on said date, latter on on or about the date of #3-10-23 diffendent bros was back around plaintiff and bragging on how hes been spitting in plaintiffs food sence the date he met plaintiff in the grvc main intake were diffendent was working 4 days week .. this the causing plaintiff to lose weight

THE NURSE INFORMED PLAINTIFF THAT HE WEIGHED ABOUT 135 pounds which was a big difference from 3 ~~months before~~ , plaintiff - WAS TOLD BY HIS LAWYER PETER DAVIS THAT HE LOST ALOT OF WEIGHT AND THAT HE LOOKED SICK , HE EVEN WHENT TO MEDICAL AND THEY ON 2-27-2023 PLAINTIFF WAS BEING ESCORTED FROM HIS HOUSING UNIT

1A BY , JOHN DOE CAPTAIN AND DIFFENDENT BROS, PLAINTIFF WAS

TOLD BY BOTH STAFF MEMBERS THAT IF HE DID NOT PUT LEG SHACKLES

THAT, HE WOULNT BE ABLE TO GO TO HIS DENTIST APPOINTMENT ,SO

BECAUSE HE WAS BEING THREATINED HE GAINED HIS COMPOSURE ,AND

COMPOLIED , ~~AN~~ PLAINTIFF TOLD BOTH STAFF MEMBERS THAT HE COULDN'T

WALK LIKE THAT WITH LEG SHACKLES ON BECAUSE , HE HAS AND WALKS

WITH A DEPARTMENTAL WALKING DEVICE, HIS (CANE) BECAUSE OF HIS

DISSABLITY TO WALK DIFFENDENT BROS DISREGARDED THAT AND SAID LETS

GO APON (ARIVEL) , PLAINTIFF SEES DIFFENDENT CORT WHO ALSO SAID ,YES

THATS HOW YOU SHOULD BE SHACKLED UP WITH YOUR CANE... AND APON

ARIVEL INTO THE DENTAL ROOM PLAINTIFF FALLS, AND HURTS HIS KNEE

HE THEN ASK FOR MEDICAL AFTER DIFFENDENT BRO STEPS OVER PLAINTIFF,

ALL AT APPROX 1PM ALL SEEN ON DIFFENDENT BROS, BODY CAMRAONCE

PLAINTIFF HELPE HIM=SELF TO HIS FEET AGAIN HE SAT DOWN, THEN DIFFENDENT

BROS STATES NIGGA YOU AINT GETTING NO MEDICAL, SHUT THE FUCK UP!!

THIS ALL ISA REponsability OF INADIQUIT MEDICAL CARE.

ALSO PLAINTIFF KNOWING THAT HE IS AND WAS NOT GIVING A HEARING TO

EVEN BE(ERS) ENN HANTS RESTANT, ON THIS SAME DAY DIFFENDENT BROS

TOLD PLAINTIFF TO **DROP**

(51)

HIS PENDING LAWSUIT AGENTS DIFFENDENT CAPT GUAN, AND ADW HENRY, CASE INFO @23-CV-0541) SO PLANTIFF FELT SCARED AND HELPLESS SO WHEN HE GOT BACK TO HIS HOUSING AREA WITHOUT RECIEVING MEDICAL HE WROTE THE PRO-SE CLERKS OFFICE AND TOLD THEM TO DISSMISS THE CASE ASAP!! See Exhibit 30

ALSO ONCE PLKANTIFF GOT BACK TO HIS UNIT HE WANTED TO CALL SICK CALL, BUT REMEMBERED THAT HIS CALLS HAVE BEEN RESTICTED FROM CALLING 614#, BECAUSE DIFFENDENT MCNEIL TOLD PLANTIFF THAT HE WOULD MAKE SURE HE NEVER GETS SICK CALL EVER ON RIKERS ILAND, AND THIS ALSO IS VERY CRULE AND UNUSAL! TO PLANTIFF...

(52)

ON SAID THIS SAID DATE PLANTIFF WAS DENIED SHOWER , AND TOLD THAT HE COULD NOT GO TO(REC) BY DIFFENDENT GUAN THE CAPTAIN WHO HE REPORTED BECAUSE OF SEXUAL ALIGATIONS, AND SEXUAL HARRASSEMENT ON , ON 2-25-23, SO ON 2-26-23 IN HOUSING UNIT 1A DEFFENDENT TOLD PLANTIFF HE GETS NOYHING WILE (HES) HERE, EVER!!! CAPTAIN GUAN ALSO WALKED UP TO PLANTIFFS CELL ON 2-26-23 WITH HIS BODY CAMRA ON AND SAID GIVE ME YOUR CANE, PLANTIFF STATED THAT HE WOULD HAVE A SEIROUSE PROBLEM WALKING WITHOUT IT , DIFFENDENT THEN STATED ON HIS BODY CAMRA THAT HE WAS NOW GOING TO MAKE SECURITY COME AND TAKE MY DISABILTY APONED CANE FROM ME, AND ALL MY PROPERTY, FOOD, FRUITS ,AND ALL OUT OF PLANTIFFS CELL.. PLANTIFF HAS NOW CBLED 311 7 TIMES (TWIS) DAY , AS YOU MAY INVESTIGATE, IF NEEDED.

~~Q22~~ DIFFENDENT CAPT GUANS CONDUCT un-Becoming ways, and ILLEGAL SEXUAL Habits, Can also Be Seen IN his nyc 22R History & ON another plaintiff or 2^s SOUTHERN DISTRICT LITUGATIONS INFO... Alexander Williams 22-CV-10537, Christopher Cano Case - , And Kwaine Thompson (Case) - 22-CV-07222 This is a Big Issue AND PLANTIFF can not get any Help for such issues...

PLANTIFF Also Asked Deffendent paulino to write a statement on what he seen ON this Day see Exhibit 31...

PLANTIFF ALSO CALLED 311 AND Received Complantant Numbers EC-005-86748

AND ON FEBRUARY 2ND CO AND KNOWN DIFFENDENT MCNEIL OF O.S.I.U CAME TO THE YARD AS YOU WILL SEE ON THE CAMRA FOR NO REASON OTHER THAN TO THRETTIN PDANTIFF WITH WITH FRUSTRATION AND ANGER, SAYING TO PLANTIFF NIGGER IMA GET YOU KILLED ASAP ! WATCH WHEN I GET YOU BACK IN GENARLE POPULATION , YOU GONE DIE IM PUTTING MONEY ON YOUR HEAD WATH AND I CAN MOVE YOU WERE EVER ,RE-MEMBER NIGGA IM OSIU , BITCH ASS DAYROOM NIGGA... TO THE POINT WERE GRVC STAFF AND ,O.SI.U OFFIIZER STAGGERS , ASK DIFFENDENT MC NEIL TO STOP, AND OFFICER WITH HIS EYES WIDE OPEN THEN SAYIN YO WHAT IS GOING ON HERE , THEN WALKING OFF THE YARD!!

①
[REDACTED]
plantiff was on suicide watch for over 3 monthes straight for many reasons from the dates of on or about 7-30-22= till on or about 11-10-22 inside or rikers iland (AMKC), and grvc , plantiff felt suicidal because he seen that diffendents were trying to kill him, plantiff was fighting alot, plantiff felt helpless, plantiff was cut and stabbed, plantiff was starved in obcc, plantiff was left to die in obcc, plantiff was denied medical many times, plantiff was put in (the box) in grvc and not given recreation, plantiff, was assaulted by officers,

sexually harrassed, plantiffs been unresonably sprayed with fire extinguishers, and chemicals, plantiff has also had hiss life thretened, plantiff has had officers spit on him and spit in his meats, plantiff has also had his contact visits taken from him for no legal reason, leaving plantiff withput way to see his son ... latter on his son dieing in hit and run if plantiff would have been able to see and touch his child, on visits maybe this would have never happened, plantiff also lost other family members and friends

2. @ at approx 9am on 2-28-23= diffendent BROS ESSCORTEED PLANT TO THE CLINIC FOR HIS HIS MEDICAL AND (prea) issues with diffendent capt GUAN ON ~~2-25-23~~ 2-25-23 ...when PLANTIFF ARIVIED, DIFFENDENT BROS ALSO WALKED INSIDE OF PLANTIFFS CUBICUAL VIOLATING PLANTIFFS HIPPA RIGHTS, PRIVACY

LAW/STATUES

AND SAYING TO THE NURSE, "MAM HES JUST FINE" CAN WE HURY UP ,CUZ IM TRYNA GO HOME"!

AND ON THE 28th of FEBRUARY 2023 in unit 1a @ approx 11:30 plaintiff seen diffendent kevin young for the second time this day ,him and 5 other security staff members , when diffendent young told plaintiff wile sitting at the dayroom table ... yo reyes you better be done drop that lawsuit nigga , diffendent refering to the pro-se case 23-cv-0541 that included , other deffendents like , capt guan , adw HENRY , KEVIN YOUNG, WILLIAM MC NEIL, AND PRESTON RITTER,

THIS HAS ALL ALSO MADE PLANTIFF, FILL THREATENED...

THE NEXT MORNING PLANTIFF WAS CRYING AND BECAME SCARED PLANTIFFS ASTHUMA, STARTED TO BOTHER HIM , AND HE ASKED

FOR MEDICAL ATTENTION AND DIFFENDENT BRANCIE REFUSED TO CALL A

MEDICAL EMERGENCY LIKE THE FLOOR OFFICER ASKED HER TO DIFFENDENT (Said)

INSTED YOUR NOT GETTING MEDICAL REYESSS!! over the microphone

leaving plaintiff to suffer in his cell...the floor officer wrote this said information inside the floor post (log book)

also for the future investigation ,plaintiff asked for medical attention at 6:50 am and plaintiff never recieved

medical attention at all this day plaintiff came out of his cell (3) at 12:30 pm for recreation ~~wee~~caughing and weezing for air, plaintiff was told by diffendent bros, that he could not get medical attention at this time also, eather i want rec 1 hour or medical, plaintiff herein feeling helpless once again...SEE EXHIBIT 33

2 minutes latter someone offered ther(asthuma) pump to plant helping plaintiff, for the moment...

Once plaintiff Return from Recreation, plaintiff Still wanted medical and now mental Health services so the John Doe floor officer told Bubble officer, to at Least Let him into the Bubble so that He could call medical, and Diffendent Brancie Said Shut up your Acting Like these stupid Inmates No-ones getting medical today!

to ALSO SUPPORT THE FACT THAT PLAINTIFF NEVER RECEIVED HIS
RELIGIOUS HALAL FOOD , YOU CAN ALSO SEE EXHIBIT 33 , plaintiff
also feels that he hasn't been given equal opportunity because
also in exhibit 33 you will also see a document supporting
the fact that people and or a person (inmate) was given his
Jewish kosher meals tho from 11- of 2022, ~~he was thrown out~~
threw 5-of 2023 all in 1A, 2A, AND 6 sprung housing in grvc
and west facility of Rikers Island!

MEDICAL ACCOMMODATIONS:

Petitioner is currently being denied medical care in the instance of his Right Eye which he has a pre-existing injury from use of force within the New York City Department of Correction with correction officers and has alerted medical staff to.

Respondents at the GRVC facility is failing to address and petitioner's restriction from the facility clinic area prevents him from being able to receive adequate medical care in reference to seeking treatment in efforts of possible saving vision/eye sight in Right eye.

Petitioner knows that respondent CO Mcniel is aware of this because of the fact in the past respondent CO Mcniel has stated to petitioner directly that he hopes that the petitioner dies and loses vision in both his eyes.

As stated herein this conduct is conduct that both respondents Assistant commissioner Thomas Griffin and Christopher Miller is known to allow to take place under their supervision and/or be involved in directly.

Both Assistant commissioners named herein as respondents has toured petitioners housing unit, order respondent WARDEN CORT and ADW HARRIS to engage in action that is adverse to petitioners protected constitutional rights with the understanding that said action is wrongful and otherwise unlawful.

For all of the reasons mentioned herein petitioner demand that the Court grant the relief he ask for herein and any other relief that ~~the Court may deem Just and Proper.~~ this Court may deem Just and Proper.

*

• plaintiff is STATING HERON , THAT ON THE DATE 8-8-23 diffendent mcneil ,and adw henry came to unit 1a in grvc instructing him to have to leave recreation early ,by diffentent BROS,PLANTIFF STATED TO DEFFENDENTS THAT HE HAD ONLY BEEN GEVING 30minutes on the yard, and that he wanted his (full hour) at re4creation, diffendents mc neil and adw henry told plaintiff that if he wanted to go to rec that her had to be strip searched first, by john doe officer who plaintiff does not want to be a part of this suit herein, once plaintiff was searched diffendents locked plaintiff inside his cell and stated that,Every time plaintiff Called 311 they would in his cell and Search plaintiff also,plaintiff was then begging for his cane back from deffendent mc neil, who took plaintiffs cane and said you can walk reyes, you dont need this to do your lawsuits do you ,implying that he was upset once agin about plaintiffs lawsiuts that was pending. so plaintiff fills that this was all retaliation ,before diffendent mcneil and ADW HENRY LEFT THE HOUSING AREA. (THEY)BOTH STATED TO THE OFFICER THAT REYES BETTER NOT GET RECREATION THIS WHOLE WEEK , AND HE IS TO NOT BE LET OUT OF HIS CELL UNTILL HE HAS TO GO TO COURT, UNTILL HE DROPS HIS LAWSUITS!! than adw henry smiled and as she was leaving said ill be back reyes ! latter , which diffendent then came back to the housing area @ about 4:50pm ... she did no tour of the housing area but she stated to the plaintiff that he was not going to get a cane to walk with, and that she would make sure ! then left the housing area again.

now the next day plaintiff was odviously, being harrassed because at around 10:05am diffendent o.s.i.u WILLAM MCneil , adw henry, and other jane/john doe offfcers came to unit 1A ONCE AGAIN NOT DOING ANY KINDS OF tour commanding tour,or superv~~ising~~ing rounds /INSPECTIONS...

and also that

these such actions were done wrongfully and constantly

plaintiffs parents, mother and father were victims of this at least

3 to 4 times each... plaintiff also states that the board of

corrections sent plaintiff documents stating that these non-

contact visits were never supposed to be implemented on plaintiff

And plaintiff complains of officer wrongful actions, and negligence
herein, why was there no paper work or documents to support
or help prevent these incidents.

plaintiff has seen mental health, on the day of 3-9-23 for such

actions and letting mental health know that he feels suicidal,

because of the constant, retaliation from listed defendants,

visit restrictions, and the effects of this red i.d, eRS, STATUS

PLAINTIFF WANTS EQUAL OPPORTUNITY AND CONSTITUTIONAL RIGHTS NOT

TO BE (VIOLATED)



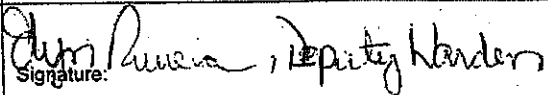
plaintiff called 311 also about his visits being violated here

are the (EC) complaint numbers

ec-005-

EC-005-93008

ec-005-

		THE CITY OF NEW YORK DEPARTMENT OF CORRECTION GEORGE R. VIERNO CENTER			
<input checked="" type="checkbox"/> NEW <input type="checkbox"/> INTERIM <input type="checkbox"/> REVISED			MEMORANDUM NO. 1/23		
EFFECTIVE DATE January 19, 2023		DISTRIBUTION: ALL STAFF		SUBJECT: 1A CMC MOVEMENT	
SUPERSEDES: N/A			REFERENCE: N/A		PAGE OF 1 PAGE
Prepared by: Deputy Warden J. Matos, Security & Operations PRINT NAME			 Signature: Deputy Warden		

EFFECTIVE IMMEDIATELY

Housing area 1A is the Court Ordered Lockdown. The individuals in this unit are on 23-hour lockdown and only allowed to exit their cells for one (1) hour for recreation. Upon escorting the individuals housed in 1A, staff shall ensure to activate their **Body Worn Cameras** and the escorting supervisor must make a radio transmission to Central Control to cease all movement.

All individuals will be escorted by one (1) Captain and two (2) Officers; however, only the individual(s) denoted below will be required to be in full restraints set up in the Facility:

- Cano Christopher 8952200296/13552006J CMC FULL-SET UP ERS/RESTRAINTS/RED-ID
- Reyes Daquan 4411804847/11638139L CMC FULL-SET UP ERS/RESTRAINTS/RED-ID
- Torres Ricky 1412001935/12922994Q CMC FULL SET-UP ERS/RESTRAINTS/RED-ID

When any individual housed in 1A is departing the facility they must be placed in the full CMC setup. Please see the names of all individuals housed in 1A:

- Cano Christopher 8952200296/13552006J (Cell #15)
- Forrest Trevor 3492002023/15028515J (Cell #5)
- Francis Walesa 4412102576/15276376H (Cell #2)
- Reyes Daquan 4411804847/11638139L (Cell #3)
- Thompson Kwaine 3491901450/07289661Q (Cell #4)
- Torres Ricky 1412001935/12922994Q (Cell #7)
- Williams Alexander 1411801632/01897858L (Cell #11)

***** FAILURE TO ADHERE TO THE CONTENTS OF THIS MEMORANDUM WILL
RESULT IN DISCIPLINARY ACTIONS. *****

* move separately & remain separate from general population

c: Antoinette Cort, Acting Warden
Elyn Rivera, Deputy Warden, Administration/ Programs

● PLANTIFF HERE COMPLAINS, THAT DEFFENDENT BRANCIE IN(GRVC) unit (1a) has been tormenting^{him} with the lights in his cell which in this specific housing area ,inmates can not controle there own lights because this is a unlawful punitive setting , deffen- dent brancie told plaintiff on many dates listed herein that she can do what she likes with the house lights ,just like plaintiff can with his lawsuits agents her, plaintiff wares vision glasses from a damaged eye socket issue, so plaintiff asked the deffendent not to blink the lights on and off it hirts his eyes (and) it MAKES PLANTIFFS HEAD HURT,DEFFENDENTS SAID SHE DID NOT CARE AND WOULD TURN THE LIGHTS ON IN THE WHOLE HOUSE, JUST TO WAKE PLANTIFF UP AT 5 or 6 am when she clocks in, these such things would happen on or about january 31st, 2-7-23,feb 8, 18, 21, march 11,12,1,5,6, 20...april , , , , all(2023). plaintiff even grieved this issue 2 different times, these such actions has gave plaintiff headaches, he even see flashes in his eyes threwout the day ... plaintiff feels that all the deffendents are trying to kill him and or make his life a living hell, plaintiff is now on suicide watch because he started to feel suicidal and scared again !his suicide watches ended around he was highly depressed, also he wants to see his family but his visitations are being violated rights plaintiff wants therapy for the rest of his life .So that Plaintiff Can prevent from really killing himself!

ON THIS DAY (OF) 3/13/23 at aprox (9:30) am captain taylor came to plaintiff with a incedent report sheet and told plaintiff to write about the incedent with deffendent bros spitting in plaintiffs food on said date in 1A, so plaintiff did so and plaintiff is also scared to eat anything at this time he is feeling suicidal and will soon kill himself plaintiff would also like for the statement sheet that was filled out on the yard (recreation yard) to also be pulled with all other discovery in this case, plaintiff is scared to report this issue again, because he feels that deffendent mc neal , and bros will retaliate agents plaintiff !!

plaintiff is on suicide watch and wont eat anything, untiill (plaintiff) feels safe, plaintiff cant sleep at night because he has seriouse stumic pains , also suffers from head aches from deffendent brandie torturing plaintiff with the lights, and also from being so hungry !

STATEMENT OF FACTS

Petitioner is detained at GRVC facility in 1a, under conditions of confinement that was banned by state and correction law by the passage of the halt act.

The conditions of the confinement are being controlled by the waarden, by officer Mcniel and ADW Harris.

Detained in City and state jails are no longer suppose to be detained held or otherwised housed in a 23 hour lockdwon manner by the passing of the Humane Alternative to Long-term solitary Confinement Act and the respondent is well as ware of this factor in the consluion of being denied the overtuirn of said city correction law and state correction law in the Courts decsion in N.Y. STATE CORR. OFFICERS & POLCIEE BENEVOLENT ASS'N V. HOCHUL, 2022 U.S. DIST LEXIS 107145.

THE HALT ACT CLEARLY STATES THAT NO INMATE SHOULD BE CONFINED IN A GELL MORE THAN 17 HOURS A DAY. MEANING THAT AT THE MOST THE RESPONDENT ARE IN VIOLATION FOR HOUSING THE PETITIONER 6 HOURS MORE THAN PERMITTED BY CORRECTION AND STATE LAW.

Secondly this matter was addressed with the respondent some 13 years ago under a seperate adminstartin and can be see in the matter of JACKSON V. HORN, 27 MISC. 3d 463, 895 N.Y.S.2d 633, 2010 N.Y. MISC LEXIS 297, 2010 NY SLIP OP 20051 (N.Y. SUP. CT JAN 11, 2010)

The conditions that the petitioner is currently living under at the GRVC facility are inhumane and ^{unlawful} ~~unlawful~~ as well as punitive in nature whihc is in direct ^{violation of} ~~violation of~~ petitioners Due Process.

These conditions adn circumsatnces are known to the respondents by way of the NUNEZ case, the matter of AGNEW v. Dep't of Correction and the HALT Act.

HALT ACT VIOLATIONS:

Respondents ADW Harris, Co Mcniel (OSIU OFFICER) , Wraden Cort and Thomas Griffin tours the petitioners housing unit weekly to make logbook notations that there is nothing to report wrong on housing unit 1a.

Adw Harris and CO Mcniel have both stated to the petitioner that 23/1 had been abolished but that they were going to do what it was that they wanted until someone physically chnaged that.

Each of the respondents named herein are aware that they are in violation of Correction law and state law as it relates to the Humane Alternative to longterm solitary confinement act because each of the respondents are aware that the facility GRVC were they are assigned to as high ranking DOC officials no longer maintain a BOX/SHU like housing unit.

It is the Halt Act that brought about the end of a DOC era for the BOX/SHU and in that same new york state bill that also abolished any form of confinement stating that DOC if prohibited from maintiang any housing unit "SEGREGATED CONFINEMENT" were an inmate is housed in the manner of being confined to their cell more than 17 hours a day.

Therefore the respondents have no argument that can support the existance of housing unit 1a where as ARTICLE III of the New York State Const., clearly explains that the judges authority/power exxtends as far as the state law goes. Meaning that a Judge does not have the power/authority to override state and correction law.

To further support this argument the petitioner directs the court attention to the current battle in the Bial Reform issue where the judical system is arguing that the judges need more leeway in judicial discretion in remaining defendants when they get arrested due to arguments that the bail reform law forces / prohibits a judge from over riding and remainding

an arrestee because the judge lacks the power/authority to do so by law.

The petitioner argument is verus to that current arguemnt by way of displaying that a judge must act within the coinfines of the law.

In this instance matter the respondents are liable for failing to inform not just his judge byy way of officials communication channels but the entire judicial system that New york City is no longer by law (HALT ACT) allowed to legally housed inmates more than 17 hours a day in a cell under confinement.

Furthermore as a secondary arguemnt the petitioner JLO Judicial Lockdown order is not suppose to be implemented in a punitive fashion, but in this case the respondents have used the JLO to circumvent the law and ~~an~~ is current appying punitive measures under the petitioners and others alike.

An example of this is in Respondents Mcniel conduct of threatening the petitioner and ordering correction officers working the housing unit floor not to allow the petitioner to engage in protected acts such a taking a shower, sending and reciving mail and cleaning his cell when needed.

The respondent ADW Harris harras correction oficers by way of forcing them to write essay's and report under the illusion that they are in violation of Departmental rules when they allow the petitioner to take a shower and/or walk to the ^{garbage} ~~garbae~~ can to empty out trash that was colletced in their cells over s short period of time.

Other condition of the petitioners confinement that is currently in violation of the law as well as the petitioners rights are as followed:

- UNIT 1A LACKS MAILBOX AND DOC CORRESPONDAGE DIRECTIVE CLEARLY STATES THAT "INMATES SHALL PLACE THEIR MAIL IN A LOCKED RECIPTICLE BOX TO BE PICKED UP BY MAILROOM CORRECTION STAFF ONLY"

- SHOWER AREA DOES NOT HAVE MATS TO ENSURE PETITIONERS AND OTHERS DO NOT SLIP AND INJURE THEMSELVES AS WELL AS CLEAN REGULARLY TO PREVENT FUNGUS LIKE THE PETITIONER HAS ACQUIRED SINCE BEING HOUSED IN UNIT 1A.
- PETITIONER IS NOT ALLOWED TO SEE MEDICAL/SICK-CALL IN THE FACILITY CLINIC AREA WHICH IS A CUSTOM, PRACTICE, POLICY BEING USED BY THE RESPONDENT WHICH HAS CAUSED THE PETITIONER NOT TO BE ABLE TO SEEK ADEQUATE MEDICAL CARE AND TO BE SEEN BY DOCTORS THROUGH HIS CELL WINDOW WHICH IS NOT PROPER AREA FOR MEDICAL EXAMINATION NOR AN AREA THAT FITS THE LEGAL CRITERIA OF A MEDICAL TREATMENT AREA.
- PETITIONER IS NOT GIVEN ANY CLEANING SUPPLIES TO CLEAN HIS CELL.
- PETITIONER IS NOT GIVEN ANY PROGRAMS, LIBRARY BOOKS, TV ACCESS ETC.
- PETITIONER DOESN'T HAVE A TABLE AND CHAIR IN HIS CELL.
- PETITIONER IS MUSLIM AND HIS FOOD IS SERVED BY CORRECTION OFFICERS WHO DO NOT POSSESS FOOD HANDLING CERTIFICATES.
- PETITIONER IS NOT ALLOWED TO GET A HAIR AND RESPONDENTS HAVE NO BARBERSHOP DAY (STATING PETITIONER CAN NOT BE AROUND POPULATION INMATES BUT RESPONDENTS ALLOW THESE SAME INMATES TO ENTER UNIT 2X DAILY TO CLEAN HOUSING UNIT 1A)
- PETITIONER HAS NOT BEEN AFFORDED HIS HALAL MEALS PURSUANT TO HIS RELIGIOUS DIETARY.

These conditions amount to being punitive in nature but the respondents have not afforded due process allowing petitioner opportunity to present legal argument in his favor.

VIOLATION OF STATE EQUAL PROTECTION RIGHTS;

Respondents New York City Dep't of correction currently maintain three other city facilities where Court Order lockdown inmates are held pursuant to a JLO.

These jails are N.I.C. North Infirmity Command, MDC Manhattan Detention Complex and West Facility.

At each of these other three jails the inmates housed there are not under punitive measures and do not receive the same treatment as the respondents at GRVC give to the petitioner and others alike.

At each of the listed facilities Court Ordered lockdown inmates received medical and sick-call when requested without delay or retaliation as petitioner has constant recived from respondent CO Mcniel and ADW Harris.

At each of the facilities listed above the court ordered lockdown inmates have access to a TV in their cell unlike the petitioners and otherds alike at GRVC.

At each of the facilities listed above court ordered lockdown inmates recived their meals under proper conditions and served by food handling certifikation personal as wel las reciving meals that in accordance with their reeligious Diet.

The respondents herein has a ^{history} ~~history~~ of being in violation of GRVC inmate at court order lockdown religious belifs and religious diets and the petitioner points to the following cases as support of this . FLORES V. CITY OF NEW YORK, 2022 U.S. DIST LEXIS 140941; WILLIAMS V. CITY OF NEW YORK ET AL, 2022 U.S. DIST 140969, where DOC officials and City of New york wa found to be in violation of maintaining a custom policy as it relates to religious restriction including religious diets.

Also in the matter of respondent CO Mcniel he was also found liable to be enagging in conduct that violated court order inmates rights by way of the First Amendment Retalaition as seen in WILLIAMS V. CITY OF NEW YORK ET AL, 2022 U.S. DIST 140969. FLORESK V. CITY OF NEW YORK ET AL, 2022 U.S. DIST LEXIS 140941; AND JOHMANNI ANDUZE V. CITY OF NEW YORK ET AL, 2022 U.S. DIST LEXIS 140929.

At the other listed facilities where the court ordered inmates are detainee those inmates have tables and chairs in thier cell for workinhg, writing letter, etc.

ON THE DATE OF 3-23-23 @ approx 6am plaintiff was being escorted by captain williams back , to his housing area 1A when while body cams were running plaintiff was taken a picture of by (dw henry) with her celll phone plaintiff looked back and seen deffendent (smilling ~~about it~~ ABOUT IT)! BY THE G.R.V.C GYM CONTROL BUBBLE!

Plaintiff Feels Harrassed And that he is being retaliated
agents, plaintiff also know that use of cell phones by
officers to Imbarrasse or Harrasse Indmates is a Violation
of D.O.C and City policys.

plaintiff latter on or about 4-1-23 was told that deffendent had a picture lingering around the jail with plaintiffs face on it, and intantley plaintiff knew that it was from this day herein that the picture was taken, plaintiff now also has the picture That was TAKEN.

plaintiff also claims that on this day. 3-23,24,25,26, all the way to on or about 4-24- of (2023) plaintiff was told by officer mc neil , dw henry , and adw harris that he would not be reciving any halal FOOD AND THAT THEY DID NOT CARE THAT IT WAS THE HOLY MONTH OF RAHMADAN !!!

so plaintiff then 311 the issue!! ec-005- , 005- ..

.....SEE EXHIBIT 40

.....

.....

.....

.....

The plaintiff was placed in a cell on January 16, 2023 by defendants Warden Cort, Adw Harris, & McNeil, that were all part of G.R.V.C. security unit, which are also named as defendants within the plaintiff's pro-se issues 23-CV-01145 ~~and the matter~~ in which is being handled by civil counsel ~~and~~ ~~the~~

before entering the cell the plaintiff overheard defendant CO McNeil state that he didn't care if the cell didn't work that he wanted Reyes where he could look on the camera and see that he was not getting no services until he dropped his lawsuits.

As soon as he entered the cell after hearing such the plaintiff searched the cell and double checked all of the appliances ~~and~~ and discovered that both the sink and toilet were essentially inoperable.

The plaintiff yelled this out of his door as the door was shut closed to which he received a response from Security officer McNeil "YOU THINK I AM PLAYING WITH YOU" "MY NIGGER MY CELL INSPECTION SHEET HERE STATES THAT EVERYTHING IN THAT (CELL) WORKS JUST FINE". While walking away McNeil stated "YOU WILL GET A WORKING CELL WHEN YOUR LAWYER DROPS HIS LAWSUIT"

Since the plaintiff had been held in the same cell that is essentially inoperable where the toilet backs up with feces daily and cause medical emergencies by rendering the plaintiff unable to breathe.

The plaintiff is aware that work orders were placed in and yet as of the date of the filing of this Second Amended Complaint "SAC" the plaintiff cell is still inoperable in comparison to many other working cells that are empty of inmates living in them and available to the plaintiff if security moved him.

DEFENDENT BROS THAT HAD A PRIOR INTSADENT BEFORE WITH THIS PLANTIFF, ON THE ON OR ABOUT DAY OFF ~~WERE~~ THE DIFFENDENT WAS SEEN SPITTING IN PLANTIFFS FOOD, PLANTIFF ~~XXXXXX~~ DID NOT EAT FOR DAYS ON IN , THEN WEEKS ON IN TO THE POINT WERE PLANTIFF LOST OVER 30 pounds in weight (body) weight , and plaintiff was also feeling suicidal, so ... with that being said why was diffendent bros back around, plaintiff if the was a investigation going on annnd defendant was also prepairing , muslim) plaintiff a none halal tray of food on the on or about date of 4-29-23, and told plaintiff that he spit in plantiffs food agian, as he walked up to plaintiff cell , defendant told plaintiff on the rec yard on 5-30-23, that difendent adw harris was his friend so nothing that i ever reported would ever gett him in any trouble at all !

On THE ON OR ABOUT DATE OF 5-18-23 adw HARRIS SAID THAT PLANTIFF WAS A FAKE MUSLIMS AND WAS NEVER GETTING HALAL FOOD IN GRVC, AND THAT PLANTIFF WAS BANED FROM RECREATION , WHICH PLANTIFF IS SUPPOSED TO GET 1 hour of everyday at least , adw harris also yelled to MR. REYES THAT HE WAS CRAZY AND THAT HE COULDNT COME OUT OF YOUR FOR ANY REASON ! all the other inmates are good in my book and this all took place in 1a unit of grvc !



also on the on or about date of 5-1-23 , i plantyiff was assaulted by a officer , by the name of tyree , were i was hit in the private area and , then adw harris impeaded plaintiff medical needs by telling , capt taylor on the mini clinic phone not to fill out any medical paper work on plantiffs behaft , because he did not like plaintiff, the doctor can and will also prove that this was also told to him on this day at approx 1 pm inside the mini clinic , doctor said that he could not do any further examinations but would document it all in plantiffs mecical recoreds ...



plantiff also shows exhibit 44 for proof from another capt that these are the things that defendant ADW HARRIS DOES, LIKE RES-
trict any inmate of whatever he wants , of phone usage to call there family members or lawyers , stop mail , recreation , shower leagel visits, and much(more).... witch are all huge violations to are consitutional rights !

I PLANTIFF ALSO FEELS THAT MY 14th AMENDMENT OF EQUAL OPERTUNITY, AND EQUAL PROTECTION RIGHTS , HAS BEEN VIOLATED BEING THAT FROM THE DATE OF ON OR ABOUT 3-8-23 untill about 6-13-23 there was 1 to 2 different inmates always allowed to walk around as they please wile plaintiff was lock down for 23 to 24 hours a (day)

plantiffs ~~WALKING~~ cane device was taken and broken by another inmate ON OR ABOUT APRIL 1st OF 2023 because unknown floor officer, and defendant lafluer told inmate to do so in 1A HOUSING UNIT OF G.R.V.C... AND NO INFRACTION WAS MADE ON SAID INMATE , WITCH IS ALSO PROOF THAT IN WAS INFORCED BY SAID DEFENDENT, AND DEFENDENT LAFLUER ~~LA~~ WAS THE FLOOR CAPTAIN AND SUPERVISOR ON THIS SAID DATE GINTIC, AND FLOOR BOOK WILL ALSO PROVE IT ! also threw the dates of 3-8-23 — 6-14-23 THIS SAME INMATE WAS TOLD TO SPIT IN PLANTIFFS THE FAKE MUSLIMS FOOD, AND SOMETIMES TO NOT FEED ME BY DIFFENDENT ADW HARRIS ; OFFICER BROS... PLANTIFF ALWAYS FELTS DEFENCELESS BECAUSE DEFENDENTS (ADW HARRIS), AND ADW HENRY WOULD ALWAYS INSTRUCT THE FLOOR OFFICERS AND CAPTAINS , TO LET OTHER INMATES EXERCISE THERE LEGS AND WALK AROUND ALL DAY FREELY, BUT TO MAKE SURE PLANT-

Exhibit 33

		NEW YORK CITY DEPARTMENT OF CORRECTION					
		FOOD SERVICE PORTION CONTROL SHEET					
DATE:	03/31/2023	DINNER		FACILITY: GRVC			
HOUSING AREA			TODAY'S T/C	G.P.	HALAL	KOSHER	DIET
MENU ITEM		SERVING PORTION SIZE	Number of Pans/Servings per Pan				
GEN. POPULATION							
Baked Battered Fish		2 each					
Tartar Sauce		1/2 oz					
Lyonnaise Potatoes		10 oz					
Steamed Vegetables		4 oz					
Sliced Cucumbers		4 oz					
Fresh Fruit		1 each					
Whole Wheat Bread		2 Slices					
HALAL							
Baked Battered Fish		2 each					
Tartar Sauce		1/2					
Lyonnaise Potatoes							
Steamed Vegetables							
Sliced Cucumbers							

					NEW YORK CITY DEPARTMENT OF CORRECTION						
FOOD SERVICE PORTION CONTROL SHEET											
DATE:		06/3/2023		LUNCH		FACILITY:		G.P.		52V	
HOUSING AREA				TODAY'S T/C				HALAL		KOSHER	
MENU ITEM		SERVING PORTION SIZE		Number of Pans/Servings per Pan				DIET			
GEN. POPULATION											
Chicken Patties		2 each									
Catsup		1 oz									
Vegetarian Baked Beans		6 oz		4							
Steamed Vegetables		4 oz									
Sliced Cucumbers		4 oz									
Whole Wheat Bread		2 slices									



NEW YORK CITY DEPARTMENT OF CORRECTION
FOOD SERVICE PORTION CONTROL SHEET

DATE: 05/11/2023

HOUSING AREA

LUNCH

FACILITY:

CRVC



MENU ITEM
GEN. POPULATION

SERVING
PORTION SIZE

TODAY'S T/C
Number of
Pans/Servings per Pan

G.P.

HALAL

KOSHER

DIETS

Tuna Salad

Pasta Salad

Pickled Beets

Cole Slaw

Fresh Fruit

Whole Wheat Bread

HALAL

Tuna Salad

Pasta Salad

Pickled Beets

Cole Slaw

6 oz

6 oz

4 oz

4 oz

1 each

2 Slices

5

4

1

6 oz

6 oz

4 oz

1



NEW YORK CITY DEPARTMENT OF CORRECTION
FOOD SERVICE PORTION CONTROL SHEET

DATE: 05/9/2023

HOUSING AREA

LUNCH

FACILITY:

CRVC



MENU ITEM

GEN. POPULATION

SERVING
PORTION SIZE

TODAY'S T/C

Number of
Pans/Servings per Pan

G.P.

HALAL

KOSHER

DIETS

Veal Patties

Catsup

Noodles

Steamed Vegetables

Mixed Green Salad

Whole Wheat Bread

HL Veal Patties

Catsup

Noodles



Steamed Vegetables

Mixed Green Salad

Whole Wheat Bread

11A

54-1

										NEW YORK CITY DEPARTMENT OF CORRECTION																			
DATE: 06/13/2023										FOOD SERVICE PORTION CONTROL SHEET																			
										LUNCH										FACILITY:									
HOUSING AREA																				TODAY'S T/C									
MENU ITEM										SERVING PORTION SIZE										Number of Pans/Servings per Pan									
GEN. POPULATION																													
Meatloaf										2 Slices																			
Corn										4 oz																			
Steamed Vegetables										4 oz																			
Whole Wheat Bread										2 Slices																			
HALAL																													
HL Meatloaf										2 Slices																			
Corn										4 oz																			
Steamed Vegetables										4 oz																			

1A

4

2


1

1

CRUC


K

G



NEW YORK CITY DEPARTMENT OF CORRECTION

FOOD SERVICE PORTION CONTROL SHEET



DATE: 03/1/2023		DINNER		FACILITY: GRVC	
		TODAY'S T/C		G.P.	
HOUSING AREA		SERVING PORTION SIZE		Number of Pans/Servings per Pan	
MENU ITEM					
GEN. POPULATION					
Frankfurters	3 each				
Mustard	1 pkt				
Vegetarian Baked Beans	6 oz				
Sauerkraut	1/2 oz				
Mixed Green Salad	4 oz				
Whole Wheat Bread	2 Slices				
Fresh Fruit	1 each				
HALAL					

1

1A

6

5

1

Exhibit 42

311 calls that were made threw the dates of 3-31-2023 threw 4-29-2023..... ABOUT ADW HARRIS , OFFICER MC NEIL , DEFFENDENT CORT,AND MORE.....

eC=006-06117

EC=006-06337

ec-006-06340

eC-006-06343

ec-006-06347

ec-006-06

ec-

plantiff fills that these listed deffents that are listed threwout this lawsuit pro se , done these crule actions puposefully, and all worked together as you will see threw are futher litagation with my honorable judge

Exhibit 43

ATTACHMENT - C



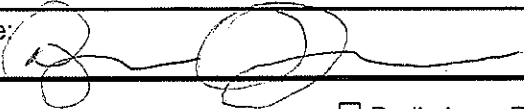



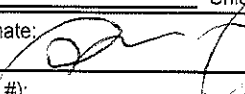
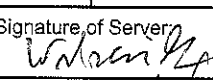
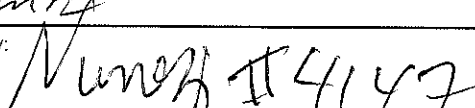
		CITY OF NEW YORK - DEPARTMENT OF CORRECTION			
OFFICE OF CONSTITUENT AND GRIEVANCE SERVICES				Form.: 7102R Eff.: 8/23/19 Ref.: Dir. 3376R-A	
DISPOSITION FORM					
Grievance Reference #: 643782		Date Filed: 04/03/2023		Facility: GRVC - 1A	
Inmate Name: Reyes, Daquan		Book and Case#: 4411804847 NYSID# 11638139L		Category: Staff (NG)	
From OCGS Inmate Statement Form, print or type short description of grievance: I Daquan Reyes would like for an investigation to be done from outside the building G.R.V.C. on how I've been being harassed by Officer Mc. Neil, and Deputys, including Matos, Henry, and Warden Cort have been negligent to this Issue! Officer is constantly trying to look at my medical records. Inside of main clinic, which he has no business doing and also threatening inmate asking inmate to give him 3 Quarters (Medically separated) and or dismissed from duty.					
Action Requested by Inmate: Investigation made from Chief Lemon, Warden Cort, and Board of Corrections.					
STEP 1: FORMAL RESOLUTION					
Check one box: <input checked="" type="checkbox"/> Grievance <input type="checkbox"/> Submission is not subjected to the Grievance Process					
The Office Of Constituent and Grievance Services proposes to formally resolve your grievance as follows below. Alternatively, OCGS staff shall provide an explanation for why the submission is not subject to the OCGS process. Grievances not subject to the Grievance Process cannot be appealed. OCGS informed Reyes, Daquan that as per DOC Directive 3376R-A.II.5-6 "Staff Complaints" submissions do not fall under the purview of OCGS and that his complaints/concerns have been forwarded to the Warden's Office for investigation/resolution.					
CHECK THE APPROPRIATE BOX BELOW AND PROVIDE YOUR SIGNATURE (Failure to sign forms will forgo your right to appeal the proposed resolution.)					
<input type="checkbox"/> Yes, I accept the resolution <input type="checkbox"/> No <input type="checkbox"/> I request to appeal the resolution of this grievance to the Commanding officer.					
<small>Note: If you appeal, the grievance staff can request for a preliminary based review if they feel the complaint was thoroughly investigated and addressed, prior to forwarding to the Commanding Officer. You will receive the outcome of this review within (3) business days to inform you the appeal will proceed or you exhausted administrative remedies. Grievance not subject to the Grievance Process cannot be appealed.</small>					
Inmate's Signature: 				Date: 4-5-23	
<input type="checkbox"/> Preliminary Review Requested					
Grievance Coordinator/Officer Signature: Mr. Parris				Date: 04/03/2023	

Exhibit 44

(Exhibit 44)

* INMATE COPY *

	CORRECTION DEPARTMENT CITY OF NEW YORK				ATTACHMENT A	
	REPORT AND NOTICE OF INFRACTION				Form: 6500A Rev. : 08/04/15 Ref. : Dir. #6500R-C	
Infraction #:	Institution: G.R.V.C	Date of Incident: 05/21/23	Time Infraction Written: 0207	Date of Report: 05/24/23		
Inmate Name (Last, First): REYES, DAQUAN		B&C/ Sentence #: 4411804847		NYSID #: 11638139L		
Location of Incident (Be Specific): 1A HOUSING AREA			Housing Area Location: 1A	Approximate Time of Incident: 1138 Hrs.		
Charge #	Offense	Charge #	Offense			
120.11	Refusal To Obey a Direct Order	110.10	Disrupting Institutional Programs			
108.10	Disorderly Conduct	105.24	CREATING A FIRE, HEALTH OR SAFETY HAZARD			
109.12	Disrespect for Staff	126.10	TAMPERING WITH SECURITY DEVICES			
Reporting Official (Print Name, Rank and Shield #): Captain Martin #1048				Reporting Official (Signature): 		
Details of Incident (include details as to How, When and Where Infraction was Committed): On May 21, 2023, I, Captain Martin #1048 was assigned as the Delta Supervisor on the 0700x1531 tour of the CMC MAX housing area. At approx. 1138 hrs. Inmate Reyes, Daquan B/C 4411804847 NYSID 11638139L Cell #3 was afforded his shower. While inmate Reyes was secured being afforded his shower, inmate Torres, Ricky B/C 1412001935 NYSID12922994Q the house pantry worker was preparing the institutional feeding trays for the house inside the pantry. Once inmate Reyes exited the shower he refused to go back into his assigned cell. Multiple verbal commands as well as IPC skills was utilized by this writer along as the escort officer Scott # 11384 for said individual to step back into his cell. Inmate Reyes refused and placed his blue buckets between his cell door preventing it from closing. This writer verbalized to inmate Reyes that he was delaying the institutional feeding and even mentioned inmate Torres being locked in the pantry hoping said inmate will comply. Inmate Reyes loudly shouted motioning towards the pantry "I don't give a fuck he's going to be in there until nine o'clock". ADW Harris #1325 was notified telephonic and asked this writer to verbalize to inmate Reyes to step back into his cell or his tablet will be turn off. Inmate Reyes became belligerent shouting "fuck dept Harris" then proceeded to the pantry door yelling profanity aggressively through the pantry door towards inmate Torres. Inmate Reyes was eventually placed in his cell, after a duration of time. However, once in his cell approx at 1645 hrs said inmate was able to manipulate his cell slot open, and tie a white sock around the door preventing it from closing and again delaying recreational services for the other inmates. Inmate Reyes even attempted to throw a brown liquid substance in a bottle, at another inmate while going to recreation. This infraction is being generated for inmate Reyes for his actions, which transpired on May 21, 2023.						
You are entitled to a hearing for this infraction no sooner than twenty-four (24) hours after you are served with this notice. If you are a sentenced inmate and you commit an infraction within twenty-four (24) hours prior to your discharge, and have not reached your maximum sentence expiration date, you may be served with charges and held for a hearing. The Department will make every effort to hold this hearing within three (3) business days of the service of this notice. This three (3) business day period excludes the day you are served, weekends, holidays, days you go to court (whether in person or via teleconference), days you are hospitalized or at a hospital attending a clinic, days you leave the facility for an attorney interview, days you are unavailable because you are transferred to another facility and days you are unavailable due to your absence from the facility for any purpose. The three (3) business day period is automatically extended by one (1) business day if you are transferred to another facility prior to your hearing (unless you are a Pre-Hearing Detention inmate). Commencement of a hearing after three (3) business days is at the discretion of the Adjudication Captain and is not barred by Department rules.						
At your hearing you have the following rights: <ol style="list-style-type: none"> 1. Right to appear personally, unless you waive your right to appear, refuse to attend the hearing or appear at the hearing and become disruptive. 2. Right to make statements. If you choose to remain silent, your silence cannot be used against you. If you make a statement, such statement cannot be used in a subsequent criminal trial unless you have been given a Miranda Warning and then voluntarily testify. 3. Right to present material evidence. 4. Right to present witnesses. 5. Right to the assistance of a Hearing Facilitator. 6. Right to an Interpreter if you cannot communicate well enough in English. 7. Right to appeal. 						
Within twenty-four hours of the Adjudication Captain reaching a decision of guilty, you will receive a copy of the "NOTICE OF DISCIPLINARY HEARING DISPOSITION" form informing you of the violation(s) you are found guilty of, the basis for that finding, the evidence relied upon and the penalty to be imposed. The following penalties are the maximum which may be imposed individually or in any combination: <ol style="list-style-type: none"> 1. Reprimand. 2. Loss of privileges. 3. Loss of good time if you are a sentenced inmate. 4. Punitive segregation for up to thirty (30) days per each applicable individual charge. 5. Restitution for intentionally damaging or destroying City property. A twenty five (\$25) dollar disciplinary surcharge will be imposed on all inmates found guilty of a Grade I or Grade II offense. You have the right to appeal an adverse decision rendered by the Adjudication Captain.						
Interpreter Requested:		<input type="checkbox"/> Yes (If yes, include what language)		<input checked="" type="checkbox"/> No		
Hearing Facilitator Requested:		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Witness(es) Requested:		<input type="checkbox"/> Yes (If yes, include witness(es) Name, Book and Case Number (if inmate) or Shield/ID (if staff) and Location (if inmate) or Post (if staff).		<input checked="" type="checkbox"/> No		
Witness (Print Name):		B&C Number:		Location:		
Witness (Print Name):		B&C Number:		Location:		
Witness (Print Name):		B&C Number:		Location:		
Witness (Print Name):		Shield/ID Number:		Post:		
I certify that I received a copy of this notice:		Signature of Inmate: 		Date: 05/24/23		Time: 0550
Served by (Print Name, Rank and Shield #): VOLOS12 AQ 5460		Signature of Server: 				
Refused to Sign for Notice: <input type="checkbox"/> Yes <input type="checkbox"/> No		Witnessed By: 				

DISTRIBUTION: (SINGLE SIDED) COPY - NOTICE TO INMATE

(DOUBLE SIDED WITH FORM 6500B) COPY TO FACILITY